

UNITED STATES DISTRICT COURT
for the
District of Oregon

United States of America
v.
YUNIS STHEVENS FALLA MORENO, and
LUIS PEREZ ROMO

Case No 3:24-MJ-00238

Defendant(s)

**CRIMINAL COMPLAINT
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 28, 2024 in the county of Lane and elsewhere in the
District of Oregon, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1), (b)(1)(A)
(viii), and 846

Possession with intent to distribute and Conspiracy to distribute 500 or more grams of a substance containing a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See attached affidavit of DEA Special Agent Corey Shannahan

☒ Continued on the attached sheet.

/s/ By Phone

Complainant's signature

Corey Shannahan, DEA Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone at 7:55 a.m. p.m.

Date: 10/29/2024

City and state: Portland, Oregon

Stacie Beckerman
Judge's signature

STACIE F. BECKERMAN, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss:

AFFIDAVIT OF COREY SHANNAHAN

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Corey Shannahan being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been employed as a Special Agent by the Drug Enforcement Administration (DEA) since January of 2022. My current assignment is at the Portland District Office where I am assigned to a DEA federal task force. My formal education includes a Bachelor of Arts in Finance. My formal law enforcement training includes successfully completing the 17-week DEA basic training course at the DEA academy in Quantico, Virginia, followed by 16 weeks of DEA field training in Portland, Oregon. During my field training, I participated in multiple drug investigations involving controlled purchase operations, interdiction, vehicle tracking, cell phone geo-location techniques, pen register/trap and trace orders, and Title III wiretaps. I have interviewed and operated informants, executed search warrants, arrested and interviewed subjects involved in the smuggling and distribution of narcotics, conducted physical surveillance, and utilized electronic and video surveillance. Prior to becoming a Special Agent, I investigated tax evasion and financial fraud for eight years while employed as a Revenue Agent for the Washington State Department of Revenue. I have also worked with and consulted numerous agents and law enforcement officers who have investigated drug trafficking offenses. As a Special Agent, I have participated in multiple drug investigations as either a case agent or as a supporting investigative agent, including in Title III wiretap

investigations. I am familiar with investigations of Drug Trafficking Organizations (hereinafter, “DTOs”), including identifying methods of importation and distribution of controlled substances, and how controlled substances are manufactured, consumed, packaged, marketed, smuggled, and distributed. I am also familiar with various tactics used by DTOs to import drugs into the United States, communicate with members of the DTOs, and arrange for transportation and distribution of drugs.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for two subjects: **YUNIS STHEVENS FALLA MORENO (FALLA)** and **LUIS RODOLPHO PEREZ ROMO (“PEREZ”)** for committing the offense of possession with intent to distribute 500 grams or more of a substance containing a detectable amount of methamphetamine, and conspiracy to distribute controlled substances in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), and 846.

3. This affidavit is intended only to show that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(viii), and 846 make it illegal to possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and to conspire to do so. Based on the facts

of this investigation as alleged herein, these offenses carry a maximum penalty of 10 years to life imprisonment, a fine of \$10 million, and not less than five years' supervised release

Statement of Probable Cause

Background of the Investigation

5. Agents and officers comprising the Drug Enforcement Administration, Homeland Security Investigations, Tigard Police Department, Washington County Sheriff's Office, and Sherwood Police Department assigned to Drug Enforcement Administration led federal task force D-51, (hereinafter collectively referred to as "Investigators") have been investigating a trend of Drug Trafficking Organizations (DTOs) utilizing Honduran nationals to distribute bulk amounts of fentanyl to retail drug customers in several metropolitan areas in the western United States to include Portland, Oregon; Seattle, Washington; Oakland, California; Denver, Colorado; and Salt Lake City, Utah.

6. Agents and officers comprising the Drug Enforcement Administration ("DEA"), Tigard Police Department ("TPD"), Washington County Sheriff's Office ("WCSO"), and Sherwood Police Department ("SPD") assigned to DEA led federal task force D-51, (hereinafter collectively referred to as "Investigators") are investigating a Mexico based Drug Trafficking Organization ("DTO") with cells operating in Oregon, Washington, California, and Mexico. The multi-cell organization is involved in the importation, transportation, and wholesale distribution of sizeable quantities of methamphetamine, heroin, cocaine, fentanyl, as well as associated money laundering and bulk cash smuggling activities. [REDACTED]

[REDACTED] this DTO imports bulk quantities of methamphetamine, cocaine, heroin and fentanyl from Mexico into the United States through ports of entries along the United States – Mexico international border.

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. On September 27, 2024, U.S. Magistrate Judge Jeffrey Armistead signed a federal search warrant authorizing Investigators to collect and monitor geolocation information for a cellphone bearing call number [REDACTED]-5113, later identified as FALLA's Phone.

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. As a result of the ongoing investigation, Investigators have so far seized over 150 kilograms of methamphetamine, approximately 32,000 fentanyl pills, fifteen firearms, and made five federal arrests.

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

[REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*Investigators Locate and Stop FALLA and PEREZ on Interstate-5 in Oregon
and Seize Approximately 55 Pounds of Methamphetamine from FALLA and PEREZ' Car*

20. On October 28, 2024, Investigators monitoring geolocation information for FALLA's Phone noted that it was travelling from San Jose, California in a northward direction

towards Oregon. In anticipation of **FALLA** arriving in Oregon with 55 pounds of methamphetamine, Investigators established surveillance along Interstate-5 while continuing to monitor geolocation information for FALLA's Phone.

21. At approximately 10:00 A.M., Investigators observed a 2017 white Ford Fusion bearing California license plate 8XQY678 driving northbound on Interstate-5 near Canyonville, Oregon. Investigators queried the license plate with the California DMV which indicated the vehicle was registered to an individual sharing FALLA's last name and was also registered to an address in San Jose, California. Investigators noted that this address was in the vicinity of where historical geolocation information indicated FALLA's Phone was located during the above-described intercepted communications. Furthermore, Investigators noted that geolocation information for FALLA's Phone indicated it was located within the general vicinity (+/- 1164 meters) of where Investigators observed the white Ford Fusion.

22. Investigators continued to physically surveille the Ford Fusion for approximately one hour as it continued to drive northwards along Interstate-5 towards Salem, Oregon. Simultaneously, geolocation information for FALLA's Phone indicated it was travelling in a pattern consistent with the white Ford Fusion. Investigators driving beside the Ford Fusion observed a Hispanic male driver that matched the physical appearance of FALLA's California driver's license.

23. At approximately, 11:09 A.M., Investigators in unmarked police vehicles activated their emergency lights behind and around the white Ford Fusion. The white Ford Fusion pulled to the side of the freeway where Investigators wearing tactical gear clearly identifying themselves as law enforcement then approached the white Ford Fusion where they found **FALLA** in the driver's seat and **PEREZ** in the backseat. Investigators detained both **FALLA** and

PEREZ without incident at this time. Subsequently, a Washington County Sheriff's Office Deputy ran his narcotics canine partner along the exterior of the white Ford Fusion. The canine partner, trained to alert his handler to the odor of narcotics alerted his handler to the trunk of the white Ford Fusion.

24. At this time, Investigators searched the white Ford Fusion where they located the following items:

- A grey plastic tote in the trunk containing ten packages of a crystalline substance wrapped in clear and black plastic packaging. Subsequent field tests of the crystalline substance returned a presumptive positive for the presence of methamphetamine and found the methamphetamine packages to cumulatively weigh 27,121.1 gross grams, roughly equivalent to 55 pounds.
- An apple iPhone found in **FALLA**'s pants pocket. Investigators called the phone number associated with **FALLA**'s Phone from a private phone number. Moments later, the screen backlight for the phone illuminated, indicating an incoming call from a private phone number.
- Several government-issued identification cards for **FALLA** inside of the car.

25. Following the vehicle stop, Investigators seized the methamphetamine and cellphone, provided both **FALLA** and **PEREZ** with their Miranda rights, and transported the methamphetamine, cellphone, **FALLA**, and **PEREZ** to the DEA Portland Office.

[REDACTED]

26. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

27. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

28. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

29. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

30. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Conclusion

32. I believe that **FALLA** and **PEREZ** conspired to deliver 27,121.1 gross grams of methamphetamine to Malfavon in Salem, Oregon, prior to their interdiction by Investigators. Furthermore, **FALLA** was also in possession of the same phone that that was intercepted in communication with Malfavon ordering 55 pounds of methamphetamine. I also believe that **FALLA** hired **PEREZ** to assist in the distribution of the methamphetamine and that **PEREZ** agreed to do so to earn a portion of the drug proceeds generate from the sale. Therefore, I believe

that **FALLA** and **PEREZ** have committed violations of the Target Offenses and have conspired with others to do so.

33. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Paul Maloney, and AUSA Maloney advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrants for **FALLA** and **PEREZ**.

Request for Sealing

34. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time is likely to seriously jeopardize the ongoing investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Sworn to by telephone

In accordance with Fed. R. Crim. P. 4.1

Corey Shannahan
DEA Special Agent

Sworn to by telephone at 7:55 a.m./p.m. this 29th day of October ~~X~~, 2024 in
accordance with Fed. R. Crim. P. 4.1.

Stacie Beckerman

HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge